

Julie Metcalf Kinney  
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**ORIGINAL**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

FILED 14 DEC '18 11:37 USDC-ORP

**William X Nietzsche (solely as trustee for  
KRME International Trust), Et al.,  
Plaintiff(s)/Affiant(s),**

**3:18-CV-01930-SI  
Case No.**

**v.**

**PLAINTIFF'S AFFIDAVIT OF  
FACT TO PIERCE THE  
CORPORATE VEIL OF  
DEFENDANT UHD**

**FREEDOM HOME MORTGAGE CORPORATION  
(FHMC), Et al.,  
Defendant(s)/Respondent(s)**

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**PLAINTIFF'S AFFIDAVIT OF FACT TO PIERCE THE CORPORATE VEIL OF UHD**

COMES NOW Plaintiff William and Julie Kinney ("The Kinney's"), by, with and through their son/trustee William X Nietzsche, to move this Court of Record to pierce the corporate veil of defendant URBAN HOUSING DEVELOPMENT, stating in support:

- 1) Defendant UHD is a Limited LIABLE Corporation.
- 2) Defendant UHD only has limited liability only to the extent it has engaged in clean-handed bonafide business.
- 3) Defendant UHD is a Limited LIABLE Corporation now that it has been caught in chancery engaging in dirty-handed malafide business.
- 4) On information and belief, Roman OZeruga is an alter-ego of Defendant UHD;
- 5) And thus a Real-Party-In-Interest.
- 6) Defendant UHD has attempted to defraud Plaintiffs as alleged in Plaintiffs Verified Complaint filed November 5, 2018;
- 7) And also alleged in Plaintiffs' supporting affidavits to this instant action, case #3:18-cv-01930-SI.

**PLAINTIFF'S AFFIDAVIT OF FACT TO PIERCE THE CORPORATE VEIL OF DEFENDANT UHD**

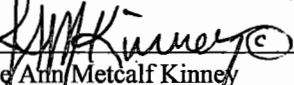
- 8) Defendant UHD's action of filing a fraudulent misDeed of Trust November 6, 2018, on the Mortgage record WITH HAVING ACTUAL KNOWLEDGE of a missing assignment on the Multnomah county records between FMC and BOI constitutes a gross violation pursuant to ORS 86.735 (1).
- 9) On information and belief, MERS' involvement in the Kinneys' Chain of Title wherein MERS is suddenly named as a beneficiary in the stead of FMC is not merely a "Scrivener's error."
- 10) Defendant UHD cannot have a right of action in the inferior state court with this federal verified complaint pending in this Court of Record.
- 11) Defendant UHD cannot have a right of action with having ACTUAL KNOWLEDGE of a missing assignment in the county records;
- 12) Ex dolo malo oritur non actio, ancient legal latin which translates to mean: "A right of action cannot arise out of fraud."
- 13) Defendant UHD's action of filing an inferior state court eviction action on or about November 19, 2018, after Plaintiffs had filed this federal action via a Verified Complaint November 5, 2018, is a complete violation of Plaintiffs Federal Due Process Right as secured by the 5th Amendment of the Constitution for the United States of America.
- 14) Defendant UHD's actions have been solely motivated with the intent to defraud the elderly Plaintiff Kinneys.
- 15) Defendant UHD's actions have been, and still remains, ultra-vires, outside of its scope of Articles of Incorporation.
- 16) For the above stated reasons, Defendant UHD shall be required to reveal the Real-Party-In-Interest who is hiding behind the corporate veil of the INCORPORATION advertised as URBAN HOUSING DEVELOPMENT.
- 17) Defendant UHD's actions have been scienter;
- 18) and with intent to induce reliance;
- 19) On information and belief, Defendant UHD has engaged in said actions with two or more co-conspirator incorporations advertised as BSS, USBNA, RLMS, CRC, MTGLQ, BOI, MERS, RTS, FMC and Roman OZeruga;
- 20) And thus constituting a gross conspiracy pursuant to 18 USC 241.


- 21) The interest of justice and of the ORderly administration of this Court of Record should result in piercing the corporate veil of defendant URBAN HOUSING DEVELOPMENT forthwith.
- 22) And SO SHALL this Affidavit pierce the incorporation that is advertised as URBAN HOUSING DEVELOPMENT.
- 23) And SO SHALL this Affidavit serve to join Roman OZeruga to this instant action as a co-conspirator in violation of 18 USC 241.

I affirm and attest the above said Affidavit to be true and correct to the best of Plaintiffs/Affiants knowledge so help me Creator.

WHEREFORE, Plaintiffs/Affiants move this Honorable Court of Record to pierce the corporate veil of Defendant URBAN HOUSING DEVELOPMENT.

RESPECTFULLY DATED this 13<sup>th</sup> day of December, 2018.

By   
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By   
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]  
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